

EXHIBIT A



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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF ARIZONA

Valentino Dimitrov, individually, and on behalf of all others similarly situated;

Case No.: 2:23-CV-00226-DJH

Plaintiffs.

vs.

Stavatti Aerospace, Ltd, a Minnesota corporation; Stavatti Aerospace, Ltd, a Wyoming corporation; Stavatti Corporation, a Minnesota corporation; Stavatti Immobiliare, Ltd, a Wyoming corporation; Stavatti Industries, Ltd, a Wyoming corporation; Stavatti Niagara, Ltd., a New York corporation; Stavatti Super Fulcrum, Ltd, a Wyoming corporation; Stavatti Ukraine, a Ukrainian business entity; Stavatti Ukraine, a Ukrainian business entity; Stavatti Heavy Industries Ltd, a Hawaii corporation; Christopher Beskar and Maja Beskar, husband and wife; John Simon and Jean Simon, husband and wife; William McEwen and Patricia McEwen, husband wife; Rudy Chacon and Jane Doe Chacon, husband and wife; and DOES 1 through 10, inclusive.

Defendants.

**DECLARATION OF GEORGE
CHEBAT IN SUPPORT OF
APPLICATION FOR ENTRY OF
DEFAULT AGAINST DEFENDANTS
STAVATTI AEROSPACE LTD, A
WYOMING CORPORATION;
STAVATTI IMMOBILIARE, LTD, A
WYOMING CORPORATION;
STAVATTI INDUSTRIES, LTD, A
WYOMING CORPORATION;
STAVATTI SUPER FULCRUM LTD, A
WYOMING CORPORATION; AND
STAVATTI HEAVY INDUSTRIES LTD,
A HAWAII CORPORATION**

I, George k. Chebat, declare under penalty of perjury that the following is true and correct:

1. I am one of the attorneys for Plaintiff and I am familiar with the file, records, and pleadings in this matter.

2. The Complaint was filed on February 3, 2023. (Doc. 1)

3. Defendants Stavatti Aerospace, Ltd, a Wyoming corporation; Stavatti Aerospace, Ltd, a Wyoming corporation; Stavatti Immobiliare, Ltd, a Wyoming corporation; Stavatti Industries, Ltd, a Wyoming corporation; Stavatti Super Fulcrum, LTD, a Wyoming corporation; and Stavatti Heavy Industries Ltd, a Hawaii corporation (collectively, “Defendants”) were each served on March 1, 2023, as reflected in the proofs of service filed on March 28, 2023. (Doc. 7).

4. Defendants Answer or other responses to the Complaint were due on or before March 31, 2023.

5. To date, the above-named Defendants have failed to plead or otherwise defend within the time allowed and therefore are now in default.

6. Plaintiff requests the Clerk of the Court enter default against each of the Defendants named herein above, jointly and severally.

7. In compliance with the requirements of 50 U.S.C. § 520, I verify that to the best of my knowledge, information, and belief, the Defendants are not in the military service.

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1 WHEREFORE, the undersigned requests the Clerk of this Court to enter default of
2 the Defendants: Stavatti Aerospace, Ltd, a Wyoming corporation; Stavatti Immobiliare,
3 Ltd, a Wyoming corporation; Stavatti Industries, Ltd, a Wyoming corporation; Stavatti
4 Super Fulcrum, LTD, a Wyoming corporation; and Stavatti Heavy Industries Ltd, a
5 Hawaii corporation.

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7 **RESPECTFULLY SUBMITTED** this 3rd day of April 2023.

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10 **ENARA LAW, PLLC**

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12 By: /s/ George K. Chebat
13 George K. Chebat
14 Joseph J. Toboni
15 Daniel de Julio
16 *Attorneys for Plaintiff*